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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

SEP 16 1992

MAIL BRANCH

In the Matter of)

)
Amendment of Section 73.202(b))
Table of Allotments)
FM Broadcast Stations)
Brighton, New York)
Channel 241A)

RM 8014

MM Docket 92-142

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To: The Commission

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

REPLY TO OPPOSITION TO PETITION FOR RULEMAKING

Renard Communications Corp. ("RCC") has received by
First Class mail comments of The West Irondequoit Central
School District. ("West Irondequoit")

RCC has been aware of WIRQ's existence and its secondary
status as a 10 watt non-commercial station. It is also recog-
nized that WIRQ was the Rochester area's first non-commercial
station having begun operation in 1960 at the frequency of
90.9 MHz.

When the Commission adopted its rules requiring that
non-commercial stations must operate with 100 watts minimum
ERP, or be subject to operating as secondary stations, many
schools and non-commercial entities heeded the Commission's
advice and for this modest increase in power required to
maintain a primary status. West Irondequoit, however, passed
on this opportunity and voluntarily chose to accept the risk
of classification as a Class D secondary station. Thus, WIRQ

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was moved to Ch. 227D. Subsequently, as Avon, NY, a nearby community, was identified as one to be allotted Ch. 227A which was part of Docket 84-231. WIRQ was then forced to move to Channel 232D. At the time of that move, Channel 232 appeared to be suitable, but again, no permanence was ever assured by this move. Also at that time, there were no U.S. or Canadian proposals pending which would make the use of Channel 232 unsuitable. However, within the past year, the Canadians have proposed and adopted the use of a new allotment at Belleville, ON, for station CBBB on Channel 232B. In accordance with the U.S.-Canadian FM Working Agreement, new full-power authorizations may be made without respect to the protection of secondary facilities. Thus, station CBBB was proposed and authorized without any consideration for WIRQ. Station CBBB is not yet in operation, but when it commences, WIRQ can expect considerable interference within the coverage area it is now used to especially due to the geographic locations of both stations on opposite shores of Lake Ontario and the tropospheric conditions which often develop. Thus, WIRQ would be advised to seek an alternate frequency on which to operate regardless of the Brighton proposal.

RCC has identified two frequencies which could be utilized. They are Channels 298 and 300. In the worst case at a HAAT of 34 m. and 19 watts ERP, WIRQ's interfering contour for co-channel (40 dBu) extends only 7.5 miles. Its first adjacent (54 dBu) only 3.3, its second adjacent (80dBu) .7 miles and its third adjacent (100 dBu) only .25 miles. According to the FCC staff, there are no IF spacing requirements for 10 watt

non-commercial secondary Class D stations. The following existing authorizations were considered in making a recommendation for either Channel 298 or 300.

Channel 298

Channel 298	Station	Approx. Distance (km.)
295	WPCX, Auburn, NY	97
296	CILQ, Toronto, ON	154
297	WFUD, Honeoye Falls, NY	40
298	CBCK, Kingston, ON	149
299	WEZQ, Wethersfield, NY	87
300	WRHP, Syracuse, NY	124

Channel 300

297	WFUD, Honeoye Falls, NY	40
298	CBCK, Kingston, ON	149
299	WEZQ, Wethersfield, NY	87
300	WRHP, Syracuse, NY	124
	CING, Burlington, ON	185

Of the two, it would appear that Channel 300 would be the best choice.

Conclusion

A Class D station must not be allowed to set any precedent by which it can impede the development of a new full service station. Regarding the Brighton allotment as a short spaced proposal with respect to CBL-FM, it is stated that a significant number of specially negotiated short spaced assignments receive some interference and the Brighton allotment is not unique in that respect. Also, the Brighton proposal will not receive any predicted interference within its community of license. In addition, it will provide interference free service to a substantial area and population within its proposed 1 mv/m contour. With respect to causing interference, it can and will adequately protect CBL-FM.

Further, RCC would be willing to provide its services and at no expense to west Irondequoit for any filings and equipment modifications or changes needed to change its operation to another channel.

Respectfully submitted,

Renard Communications Corp.

by:

Its President

9/15/92